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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 21-493-EMC
)	
Plaintiff,)	STIPULATION TO CONTINUE STATUS DATE
)	AND EXCLUDE TIME FROM MARCH 9, 2022 TO
v.)	MARCH 30, 2022, AND [PROPOSED] ORDER
)	April 6, 2022
TIMOTHY MOUTINHO,)	
)	
Defendant.)	

The parties are set for a status hearing in this case on March 9, 2022. However, the parties stipulate and request that the hearing be continued to March 30, 2022 because the defense needs more time to review discovery and consider the government's plea offer.

Further, it is hereby stipulated by and between counsel for the United States and counsel for the defendant Moutinho, that time be excluded under the Speedy Trial Act from February 2 through March 30, 2022 for the same reasons. Therefore, the parties stipulate and agree that excluding time until March 30, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from through March 30, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

STIPULATION TO EXCLUDE TIME AND ~~[PROPOSED]~~ ORDER

Case No. 21-493-EMC

v. 7/10/2018

1 The undersigned Assistant United States Attorney certifies that he has obtained approval from
2 counsel for the defendant to file this stipulation and proposed order.

3
4 IT IS SO STIPULATED.

5 DATED: 3/8/22

/s/
ANKUR SHINGAL
Assistant United States Attorney

7
8 DATED: 3/8/22

/s/
CANDIS MITCHELL
Counsel for Defendant **MOUTINHO**


9
10 ~~[PROPOSED]~~ ORDER

11 The Court orders that the status in this case be continued to ~~March 30, 2022.~~ **April 6, 2022, at 1:00 p.m.**

12 Further, based upon the facts set forth in the stipulation of the parties and for good cause shown,
13 the Court finds that failing to exclude the time from March 9, 2022 through ~~March 30, 2022~~ would **April 6, 2022, at 1:00 p.m.**
14 unreasonably deny defense counsel and the defendant the reasonable time necessary for effective
15 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The
16 Court further finds that the ends of justice served by excluding the time through ~~March 30, 2022~~ from **April 6, 2022, at 1:00 p.m.**
17 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a
18 speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time
19 through ~~March 30, 2022~~ shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §
20 3161(h)(7)(A), (B)(iv). **April 6, 2022, at 1:00 p.m.**

21 IT IS SO ORDERED.

22
23 DATED: March 9, 2022


HON. EDWARD M. CHEN
United States District Judge